



State of Utah

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*Lieutenant Governor*

Office of the Governor  
PUBLIC LANDS POLICY COORDINATING OFFICE

KATHLEEN CLARKE  
*Director*

December 22, 2016

*Sent via electronic mail: [johnbaza@utah.gov](mailto:johnbaza@utah.gov)*

John Baza  
Director  
Division of Oil Gas and Mining  
1594 West North Temple, Suite 1210  
P.O. Box 145801  
Salt Lake City, UT 84114-5801

Subject: SUFCO Mine – Greens Hollow Amendment  
C/041/0002, Task 5259

Dear Mr. Baza:

The Public Lands Policy Coordinating Office received the attached technical comments from the Utah Division of Wildlife Resources (UDWR) in regard to the Greens Hollow lease within the Parker Mountain-Emery Sage-grouse Management Area (SGMA), which DOGM requested consultation with UDWR in relation to the sage-grouse.

Thank you for the opportunity to review and provide comments on the proposed action to help mitigate impacts to greater sage-grouse habitat. Please call if you have any questions to discuss your concerns.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kathleen Clarke".

Kathleen Clarke  
Director

cc: Lisa Reinhart, Environmental Scientist  
*Sent via electronic mail: [lreinhart@utah.gov](mailto:lreinhart@utah.gov)*  
Dana Dean, Associate Director  
*Sent via electronic mail: [danadean@utah.gov](mailto:danadean@utah.gov)*

## Technical Comments

The Greens Hollow lease contains both winter habitat and opportunity habitat for the greater sage-grouse. Habitat for greater sage-grouse is defined in the *Conservation Plan for Greater Sage-grouse in Utah* (Plan) as:

*“the aggregation of seasonal habitats used by sage-grouse at some point during the yearly life-cycle of the birds. Habitat includes the geographical extent of leks, nesting, brood-rearing, late-brood rearing, transitional and winter areas.”*

Opportunity areas are defined in the Plan as:

*“those portions of a SGMA that currently do not contribute to the life cycle of sage-grouse but are areas where restoration or rehabilitation efforts can provide additional habitat when linked to existing sage-grouse populations.”*

As UDWR understands, the permit amendment would only be to expand underground coal mining, which includes the potential for ventilation shafts. In Section 5.5 of the Plan, extractive mineral development is addressed to discuss surface disturbing activities required for mining, such as surface vents, which are considered essential for human safety and must be permitted.

In order to limit impacts from surface development such as vents, a management protocol for development within an SGMA is outlined in Section 6.0. Overall, surface disturbance should be avoided to the greatest degree possible. Management protocol for winter habitat (Section 6.5.1.3) describes avoidance if possible, followed by minimization by locating development in the least important habitats or by taking advantage of topographic screening. If minimization is insufficient, then mitigation is required, calculated at a 4:1 ratio.

Activities should be avoided from November 15 - March 15 to reduce disturbances to wintering sage-grouse. Opportunity areas (Section 6.5.3) may be employed to meet restoration or rehabilitation goals, or as mitigation for disturbance within habitat. Opportunity areas may also be employed as the site for disturbances which are diverted from sage-grouse habitat.

UDWR appreciates the opportunity to characterize the values of the sage-grouse habitats influenced by this proposal. Following the issuance of the permit, please consult with Makeda Hanson (435-630-0805) at UDWR's Price office, for further evaluation and guidance on site-specific developments.